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17 **UNITED STATES DISTRICT COURT**  
18 **DISTRICT OF NEVADA**

19 THE ERECTION COMPANY, INC., a  
20 Washington Corporation

21 Plaintiff,  
22 vs.

23 ARCHER WESTERN CONTRACTORS, LLC,  
24 a Delaware foreign limited-liability company; POSTEL  
25 ERECTION GROUP, LLC, a domestic limited liability company; POSTEL WEST, INC., an Arizona corporation; POSTEL INDUSTRIES, INC., an unknown entity; TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA; DOES I through X; ROES XI through XX

26 Defendants.

27  
28 **AND RELATED ACTIONS**

1 CASE NO. 2:12-cv-00612-MMD-NJK

2 **JOINT MOTION AND PROPOSED  
3 ORDER FOR AN EXTENSION OF TIME  
4 FOR THE PARTIES TO FILE A JOINT  
5 PRETRIAL ORDER WITH THE COURT**

6 (Fourth Request)

7 Plaintiff, The Erection Company (“TEC”), and Defendants, Archer Western Contractors, LLC (“AWC”), Travelers Casualty and Surety Company of America (“Travelers”) and Postel Industries, Inc., (“Postel”), by and through their counsel of record, hereby jointly move for an Order extending the deadline in which the parties have to file a Joint Pretrial Order with the Court. Pursuant to the Court’s Order filed July 2, 2015, the Court ordered that the parties file a Joint Pretrial Order with the Court. (See Dkt. #250). The parties have previously exchanged draft pretrial orders, but request further extension of the Joint Pretrial Order deadline to August 6, 2015 for the following reasons: (1) Plaintiff’s lead counsel will be out of the office for a period of time due to the birth of his child; (2) in

1 anticipation of the meeting between counsel, TEC, AWC, and Travelers have exchanged initial drafts  
 2 of the Joint Pretrial Order, but additional time is required for TEC's, AWC's, Travelers', and Postel's  
 3 counsel to meet and discuss the contents of the Joint Pretrial Order; (3) to afford the Court the  
 4 opportunity to decide AWC's Motion to Stay (Dkt #248), though the filing of the pretrial order is not  
 5 dependent on a decision on AWC's Motion to Stay; and (4) the parties are still having discussions  
 6 whether to exclude the respective sureties from the trial pursuant to a stipulation, thereby streamlining  
 7 the trial herein. The brief extension of the deadline to file the pretrial order will allow the parties to  
 8 review the proposed drafts, discuss stipulations, and hold a meaningful meet and confer on the Joint  
 9 Pretrial Order. Consequently, the parties jointly request an Order from the Court extending the  
 10 deadline in which the parties have to file their Joint Pretrial Order from July 21, 2015 until August 6,  
 11 2015.

12 DATED this 16th day of July, 2015.

13 THE FAUX LAW GROUP

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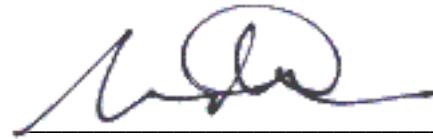
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1 The Erection Company, Inc. v. Archer Western Contractors, LLC, et al.  
2 United States District Court, District Of Nevada Case No. 2:12-cv-00612-MMD-NJK  
3 Joint Motion and Proposed Order for an Extension of Time for the  
Parties to File a Joint Pretrial Order with the Court (Fourth Request)

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5 **ORDER**

6 IT IS SO ORDERED:



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8 United States District Court Judge

9 DATED: July 20, 2015

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